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 Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

KENNETH DIONE WARD,)	
)	
Plaintiff,)	CASE NO.
)	2:22-cv-02001-APG-DJA
v.)	
)	CONSENT MOTION
)	FOR EXTENSION OF TIME TO FILE
KILOLO KIJAKAZI, ACTING)	PLAINTIFF'S BRIEF
COMMISSIONER OF SOCIAL SECURITY,)	
)	
Defendant.)	
_____)	

Plaintiff by his attorney, moves for a sixty (60) day extension of time to file Plaintiff's opening brief. Plaintiff's opening brief is currently due to be filed May 18, 2023.

Counsel requests this extension due to multiple, simultaneous filing deadlines. Counsel requires additional time to properly and thoroughly prepare Plaintiff's brief. For instance, between May 12, and July 12, 2023, staff in Counsel's office have two hundred and eight (208) Plaintiff briefs due. This figure does not include Oral Arguments, appeals to Circuit Courts, Reply Briefs, settlement negotiations, and the various other tasks which arise throughout the course of litigation. These circumstances do not allow for Plaintiff's Counsel to properly prepare

1 the brief by the current deadline. This request will not cause Defendant any undue hardship. This
2 extension is needed to thoroughly and properly prepare the brief by the current deadline.

3 Wherefore, Plaintiff requests an extension from May 18, 2023, up to and including July
4 17, 2023 to file their brief. Counsel for the Plaintiff has conferred with Defendant's Counsel who
5 kindly consents to this request.
6

7 Dated May 8, 2023.

8 Respectfully submitted,

9 /s/Hal Taylor

10 Hal Taylor, Esq.

11
12 **Plaintiff's Certificate of Service:**

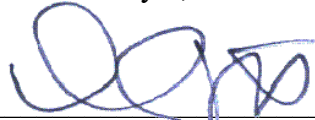
13 I certify that I caused the Consent Motion for Extension of Time to be served today, May
14 3, 2023, by CMECF to Blaine T. Welsh, and Oscar Gonzalez, who are filing users of the
15 CM/ECF system.
16

17 /s/Hal Taylor

18 Hal Taylor
19
20

21 **IT IS SO ORDERED.**

22 DATED: May 9, 2023

23
24 

25 DANIEL J. ALBRECHTS

26 UNITED STATES MAGISTRATE JUDGE
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